

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
v.
Plaintiff,

TORIN J. FINVER,
Defendant.

**NOTICE OF MOTION
TO FILE UNDER SEAL**

CASE NO. 18-mj-05282-MJR

STATE OF NEW YORK)
COUNTY OF ERIE) ss:
CITY OF BUFFALO)

BARRY NELSON COVERT, ESQ., being duly sworn, deposes and says:

1. I represent the defendant Torin Finver.
2. Your deponent requests that the defendant's Response to the Government's Notice

of Motion and Motion for Bail Revocation be filed under seal because the information set forth therein deals with issues in the case that should not be made available to the public.

WHEREFORE, your deponent prays that this Court rule accordingly.

DATED: Buffalo, New York
November 15, 2019

Respectfully submitted,

/s/Barry Nelson Covert, Esq.
BARRY NELSON COVERT, ESQ.
LIPSITZ GREEN SCIME CAMBRIA LLP
Attorneys for Defendant
TORIN FINVER
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Subscribed and sworn to before me this
15th day of November, 2019

/s/Kristina Drewery
Commissioner of Deeds, Qualified in Erie County
My Commission Expires December 31, 2020

TO: JOSHUA A. VIOLENTI, ESQ.
ASSISTANT UNITED STATES ATTORNEY
Federal Centre
138 Delaware Avenue
Buffalo, New York 14202